

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TENIA GOSHAY, PERSONAL REPRESENTATIVE  
OF THE ESTATE OF CORNELIUS FREDERICK,  
DECEASED,

Plaintiff,

v.

Case No. 1:21:-cv-00848

Hon. Robert J. Jonker

LAKESIDE FOR CHILDREN d/b/a LAKESIDE  
ACADEMY; LAKESIDE ACADEMY; SEQUEL  
YOUTH SERVICES OF MICHIGAN, LLC;  
SEQUEL TSI HOLDINGS, LLC; SEQUEL YOUTH  
AND FAMILY SERVICES, LLC; SEQUEL ACADEMY  
HOLDINGS, LLC; SEQUEL YOUTH SERVICES, LLC;  
COLE HODGE (DEFENDANT #1); ZACHARY SOLIAS  
(DEFENDANT #2); MICHAEL MOSLEY (DEFENDANT #3);  
ORLANDO LITTLE, JR. (DEFENDANT #4); COADY RIES  
(DEFENDANT #5); MAURICE DAVIS (DEFENDANT #6);  
JA'SHON CHEEKS (DEFENDANT #7); BRANDON REYNOLDS  
(DEFENDANT #8); HEATHER MCLOGAN (DEFENDANT #9);  
and BRADLEY HODGE (DEFENDANT #10)

Defendants.

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HARRINGTON P.C.

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FELTY, PC

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<p><b>JONATHAN R. MARKO (P72450)</b>  MARKO LAW, PLLC  <i>Attorney for Plaintiff</i>  300 Broadway Street  Fifth Floor  Detroit, MI 48226  (313) 777-7529;  Fax (313) 771-5785  <a href="mailto:jon@markolaw.com">jon@markolaw.com</a></p> <p><b>GRETCHEN L. OLSEN (P36619)</b>  TANOURY, NAUTS, MCKINNEY &amp;  DWAHY, PLLC  <i>Attorney for Michael Mosley</i>  38777 Six Mile Road, Suite 101  Livonia, MI 48152  (313) 964-4500;  Fax (734) 469-4298  <a href="mailto:gretchen.olsen@tnmglaw.com">gretchen.olsen@tnmglaw.com</a></p>	<p><b>DANIEL FERRIS (P69633)</b>  Kerr, Russell &amp; Weber, PLC  <i>Attorney for Lakeside for Children  d/b/a Lakeside Academy; Lakeside  Academy; Sequel Youth Services of  Michigan, LLC; Sequel TSI Holdings,  LLC; Sequel Youth and Family  Services, LLC; Sequel Academy  Holdings, LLC; Sequel Youth  Services, LLC</i>  500 Woodward Ave., Ste. 2500  Detroit, MI 48226-5499  (313) 961-0200;  Fax (313) 961-0388  <a href="mailto:dferris@kerr-russell.com">dferris@kerr-russell.com</a></p>
<p><b>STEVEN J. BONASSO (P55529)</b>  CORBET SHAW ESSAD &amp;  BONASSO PLLC  <i>Attorney for Zachary Solias</i>  30500 Van Dyke Ave., Suite 500  Warren, MI 48093  (313) 964-6300;  Fax (313) 964-6310  <a href="mailto:steven.bonasso@cseb-law.com">steven.bonasso@cseb-law.com</a></p>	<p><b>AMY SCHLOTTERER (P59813)</b>  RUTLEDGE MANION RABAUT  TERRY &amp; THOMAS PC  <i>Attorney for Heather McLogan</i>  300 River Place Dr., Ste. 1400  Detroit, MI 48207-5095  (313) 965-6100;  Fax (313) 965-6558  <a href="mailto:aschlott@rmrtt.com">aschlott@rmrtt.com</a></p>

### **ANSWER TO COMPLAINT**

NOW COME Defendants, **COLE HODGE, ORLANDO LITTLE, JR., COADY RIES, MAURICE DAVIS, JA'SHON CHEEKS, BRANDON REYNOLDS, and BRADLEY HODGE**, by and through their Attorneys, SULLIVAN, WARD, PATTON, GLEESON & FELTY, PC, and in Answer to Plaintiff's Complaint, state:

## **JURISDICTION AND PARTIES**

1. Denied in the manner and form alleged for the reason that the allegations constitute conclusions of law and leave the Plaintiff to her proofs.

2. Denied in the manner and form alleged for the reason that the allegations constitute conclusions of law and leave the Plaintiff to her proofs.

3. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

4. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

5. Denied in the manner and form alleged for the reason that the allegations constitute conclusions of law and leave the Plaintiff to her proofs.

6. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

7. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

8. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

9. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

10. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

11. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

12. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

13. Denied in its entirety for the reason that the allegations are untrue.

14. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

15. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

16. Denied in its entirety for the reason that the allegations are untrue.

17. Denied in its entirety for the reason that the allegations are untrue.

18. Denied in its entirety for the reason that the allegations are untrue.

19. Denied in its entirety for the reason that the allegations are untrue.

20. Denied in its entirety for the reason that the allegations are untrue.

21. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

22. Denied in its entirety for the reason that the allegations are untrue.

23. Denied in its entirety for the reason that the allegations are untrue.

## **FACTS**

24. Defendants herein repeat answers to each and every allegation contained in Paragraphs 1 through 23 of Plaintiff's Complaint as though set forth herein at length.

25. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

26. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

27. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

28. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

29. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

30. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

31. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

32. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

33. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

34. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

35. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

36. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

37. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

38. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

39. Denied in its entirety for the reason that the allegations are untrue.

40. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

41. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.



42. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

43. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

44. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

45. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

46. The Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations.

47. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

48. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

49. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

50. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

51. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

52. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

53. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

54. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

55. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

56. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

57. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

58. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

59. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

60. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

61. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

62. (Including subparagraphs a-f) The Defendants admit that certain duties were owed to the Plaintiff's Decedent. However, the Defendants deny that the allegations within the said Paragraph are a

proper statement of the law, furthermore, the Defendants deny breaching any duties owed to the Plaintiff's Decedent.

63. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

64. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

65. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

**COUNT I**  
**MONELL CLAIM AS TO THE CORPORATE DEFENDANTS**

66. Defendants herein repeat answers to each and every allegation contained in Paragraphs 1 through 65 of Plaintiff's Complaint as though set forth herein at length.

67. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

68. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

69. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

70. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

71. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

72. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

73. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

74. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

**COUNT II**  
**43 USC § 19083 INDIVIDUAL VIOLATIONS OF THE**  
**EIGHTH AND/OR FOURTEENTH AMENDMENTS**

75. Defendants herein repeat answers to each and every allegation contained in Paragraphs 1 through 74 of Plaintiff's Complaint as though set forth herein at length.

76. The Defendants admit that certain duties were owed to the Plaintiff's Decedent. However, the Defendants deny that the allegations within the said Paragraph are a proper statement of the law, furthermore, the Defendants deny breaching any duties owed to the Plaintiff's Decedent.

77. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

78. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

79. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

80. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

81. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

82. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,



Defendants offer no answer in that the allegations relate to another Defendant only.

83. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

84. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

85. (Including subparagraphs a-o) Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

86. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations, Defendants offer no answer in that the allegations relate to another Defendant only.

87. Denied as to the allegations relating to these Defendants for the reason that the same are untrue. As to the balance of the allegations,

Defendants offer no answer in that the allegations relate to another Defendant only.

**WHEREFORE**, Defendants herein pray that this Honorable Court enter its judgment of no cause for action in favor of these Defendants and allow them all reasonable Court costs and attorney fees incurred in defense of Plaintiff's Complaint.

### **FURTHER ANSWER**

Further answering Plaintiff's Complaint in each and every section, the Defendants aver they were guided by all of their legal duties and obligations imposed by operation of law and otherwise, and all of their actions were careful, prudent, proper and lawful.

Further answering said Complaint, these Defendants aver that the Plaintiff's Complaint on its face is improper in form; that it is inadequate, insufficient and defective in that it pleads only conclusion; that it fails to contain the required allegations necessary to state a cause of action, either as a matter of fact or as a matter of law, and accordingly should be stricken. Defendants give notice that a Motion for Summary Disposition will be brought on for hearing before the judge of this Court to whom this case shall be regularly assigned to hear such motions at a time to be provided hereafter.

## **DEMAND FOR BILL OF PARTICULARS**

These Defendants demand an itemized Bill of Particulars setting forth specifically and in detail, each and every item of loss, damage and expense claimed and relied upon by the Plaintiff together with the nature and amount of such item(s), and the person(s) to whom such amount(s) have been paid or indebtedness exist(s); these Defendants hereby give notice that upon failure of Plaintiff to timely furnish same, these Defendants will request to have this case dismissed because of such failure.

Respectfully submitted,

**SULLIVAN, WARD, PATTON,  
GLEESON & FELTY, P.C.**

By: /s/ Todd A. McConaghy  
TODD A. MCCONAGHY (P55675)  
LEE C. PATTON (P26025)  
RONALD S. LEDERMAN (P38199)  
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[rlederman@sullivanwardlaw.com](mailto:rlederman@sullivanwardlaw.com)

Dated: December 2, 2021  
W2534935.DOCX

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing instrument was electronically filed with the Clerk of the Court using the ECF system which will serve a copy of same upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on December 2, 2021, by:

<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> Hand Delivered	<input type="checkbox"/> Other: Email
<input type="checkbox"/> Fax	<input type="checkbox"/> Overnight Courier	
<input type="checkbox"/> Fed. Express	<input checked="" type="checkbox"/> Other: Efile	

Signature: /s/ Denise Roulo

Sullivan, Ward, Patton, Gleeson & Felty, P.C.

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